Remarks

Claims 1-25 are in the application, of which only claim 1 is in independent form and is amended. Applicants have amended the last paragraph of claim 1 to improve parallel sentence structure and clarify the comparative relationship expressed in the concluding clause.

Before responding to the rejections set forth in the Office action, applicants note that none of the rejections addresses then newly added dependent claims 24 and 25.

Claims 1-23 stand rejected under 35 USC § 112, second paragraph, for indefiniteness. The Examiner states that "[a]pplicant claims rapid removal of target material while retaining dimensional stability of the target material." (Office action at 2.) Applicants agree that the above-quoted statement, if it accurately portrayed the entirety of claim 1, would render it indefinite for internal inconsistency. Applicants contend, however, that the above-quoted statement oversimplifies the claimed inventions and reveals a misunderstanding of them and their relationship to the teachings of Cordingley et al. Applicants respond as follows.

Claim 1 recites (1) applying heat energy in the form of a light beam to the target material location to elevate its temperature while substantially maintaining the dimensional stability property of the target material and (2) directing for incidence on the target material location a processing laser output characterized by laser beam parameters that are appropriate to effect removal of the target material. Claim 1 recites, therefore, separate applications of light, one of which applications delivers heating energy that does not affect the dimensional stability of the target material (which includes the target material location) and the other of which applications effects removal of the target material.

The last paragraph of claim 1, amended as described above, concludes by stating that the combined incidence of the processing laser output on and application of heating energy to the target material location remove a portion of the target material at a material removal rate that is higher than that achievable by the processing laser output in the absence of the heating energy.

What the Examiner overlooks in claim 1 is the recitation of separate application of heat energy in the form of a light beam with properties that do not disturb the dimensional stability of the target material. This is apparent in the Response to Arguments, in which the Examiner states that "Cordingley et al discloses an improved **thermal** based laser method for processing a predetermined microstructure formed on a substrate without

causing undesirable changes in electrical and physical characteristics of the substrate or other structures formed on the substrate." (Office action at 6.) (Emphasis in original.)

The Examiner's response describes laser processing (i.e., removal of target material) in the absence of inflicting damage on neighboring structures and the substrate supporting them, but it ignores the recitation of a separate application of thermal energy and the benefits resulting from it. Applicants contend, therefore, that the Examiner is incorrect in her position and requests that this rejection be withdrawn.

Except as noted above with reference to claims 24 and 25, the pending claims stand rejected on prior art grounds for anticipation or obviousness for essentially the same reasons as those set forth in the previous Office action. Because they believe their arguments disputing the 35 USC § 112, second paragraph, rejection address the same issues and thereby overcome the prior art rejections, applicants see no merit in repeating here the prior art rejections and the arguments applicants previously presented in response to them.

Applicants believe their application is in condition for allowance and respectfully request the same.

Respectfully submitted,

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